ORIGINAL

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact Upon the	)	
Existing Television Broadcast	)	
Service	)	

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Florida West Coast Public Broadcasting, Inc. ("WEDU"), licensee of noncommercial educational television station WEDU, Channel *3, Tampa, Florida, by its counsel, hereby supplements its June 13, 1997 Petition for Reconsideration ("Petition") of the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"). WEDU objected to the *Sixth R&O* insofar as it allotted Channel *54 for WEDU as its paired digital TV channel and specified particular reference coordinates for vacant reserved DTV Channel *5 at Bradenton, Florida.[1/]

As described more fully in the Petition, requiring WEDU to use an out-of-band DTV channel would cause substantial and unnecessary hardship. WEDU stated that it was engaging in engineering studies and hoped to find a workable alternative DTV channel within the core spectrum. Unfortunately, as reflected in the attached engineering

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1/ In the *Order*, DA 97-1377 (released July 2, 1997), the Chief, Office of Engineering and Technology, provided parties requesting reconsideration of individual DTV allotments until August 22, 1997 to submit supplemental information relating to their petitions.

statement of Kessler & Gehman Associates, Inc., no other channel in the core spectrum could be identified for use at this time. Therefore, WEDU withdraws its reconsideration request on that point. However, WEDU urges the FCC to consider the future substitution of a core channel for DTV Channel *54 if, as a result of other TV stations ceasing broadcasting on either their NTSC or DTV channels, a channel becomes available for WEDU's use.

Kessler & Gehman Associates, Inc. has also studied the reserved DTV Channel *5 allotment at Bradenton, Florida. As noted in WEDU's Petition, DTV Channel *5 appears to be a substitute channel for NTSC Channel *19 at Bradenton, for which WEDU is the only applicant. WEDU intends to request the FCC to permit it to amend its Bradenton application to specify DTV Channel *5. WEDU requested in the Petition, however, that it would like to locate the Channel *5 facility at the Riverview Antenna Farm, at coordinates 27-50-52 NL, 82-15-48 WL. As reflected in the attached Engineering Statement, WEDU could operate DTV Channel *5 from the Riverview site without causing interference to other NTSC or DTV channels and still provide a 28 dBu or better signal over Bradenton. The Engineering Statement reflects that the DTV station could be operated with maximum directional power of 26 dBW (398 watts) at 491 meters HAAT. Therefore, WEDU reiterates its request that the reference coordinates, power and height for DTV Channel *5 at Bradenton be modified to permit the use of that channel at the Riverview site.

Respectfully submitted,

FLORIDA WEST COAST PUBLIC
BROADCASTING, INC.

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August 22, 1997

ENGINEERING STATEMENT OF KEITH G. BLANTON OF THE FIRM OF KESSLER AND GEHMAN ASSOCIATES, INC.,CONSULTING ENGINEERS, IN CONNECTION WITH THE DIGITAL TELEVISION ASSIGNMENT TO FLORIDA WEST COAST PUBLIC BROADCASTING, INC. LICENSEE OF TELEVISION BROADCAST STATION WEDU-TV NTSC CHANNEL 3 AT TAMPA, FLORIDA

I, Keith G. Blanton, am an associate of Kessler and Gehman Associates, Inc., with offices in Gainesville, Florida. I have been working in the field of radio and television consulting engineering since 1961. I graduated from Duke University in 1951 with a Bachelor of Science degree in Physics.

This firm has been employed by Florida West Coast Public Broadcasting, Inc. licensee of television broadcast station WEDU-TV operating on NTSC channel 3 at Tampa, Florida to make engineering studies in connection with the DTV assignment in the 6th Report and Order in MM Docket 87-268 to be used by WEDU for digital television broadcasting. The FCC has assigned DTV channel 54 for the use of WEDU during the transition period proposing at the same time that only DTV channels in the band 7 through 51 would be permitted at the end of the transition period thereby excluding both the NTSC and DTV channels assigned for the use of WEDU. The engineering studies we have made demonstrate that based on the separation requirements proposed in the 6th Report and Order there is no channel in the proposed core area that could be used by WEDU during the transition period or until such time that other television broadcast stations cease broadcasting on either their NTSC or DTV channel at which time a channel may become available for the use of WEDU.

KESSLER AND GEHMAN ASSOCIATES, INC.

Keith G. Blanton

August 19, 1997

Keith G. Blanton, Consultant

ENGINEERING STATEMENT OF KEITH G. BLANTON OF THE FIRM OF KESSLER AND GEHMAN ASSOCIATES, INC.,CONSULTING ENGINEERS, IN CONNECTION WITH THE DIGITAL TELEVISION ASSIGNMENT TO FLORIDA WEST COAST PUBLIC BROADCASTING, INC. LICENSEE OF TELEVISION BROADCAST STATION WEDU-TV NTSC CHANNEL 3 AT TAMPA, FLORIDA

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This firm has been employed by Florida West Coast Public Broadcasting, Inc. licensee of television broadcast station WEDU-TV at Tampa, Florida to make engineering studies in connection with the DTV assignment in the 6th Report and Order in MM Docket 87-268 for Channel 5 at Bradenton, Florida. DTV Channel 5 is a reserved allotment that apparently substitutes for NTSC reserved Channel 19 at Bradenton, for which WEDU is the sole applicant. WEDU intends to request that its application for Channel 19 be amended to specify DTV Channel 5. However, WEDU seeks to be able to construct and operate DTV Channel 5 from a tower location at the Riverview Antenna Farm location at N. Latitude 27° 50′ 52" W. Longitude 82° 15′ 48". WEDU would propose to use a directional antenna such as the Dielectric THP-C2 cardioid antenna mounted at 491 meters AMSL to provide the necessary protection to the co-channel and adjacent channel NTSC stations WUFT channel 5 at Gainesville, FL, WCPX channel 6 at Orlando, FL and WPTV channel 5 at West Palm Beach, FL.

Studies have been made in accordance with OET Bulletin No. 69 that indicate that such operation would not cause interference within the Grade B contours of WUFT, WCPX and WPTV in areas that they would serve. In addition the studies demonstrate that the proposed station would provide a 28 dBu or better signal over the principal community of Bradenton to which DTV channel 5 has been assigned. The studies were made using a maximum directional power of 26 dBW or 398 watts to provide the interference and coverage shown on the attached maps Figures 1, 2, 3 and 4. It is acknowledged that using the Dielectric THP-C2 antenna would require a grant of a waiver of

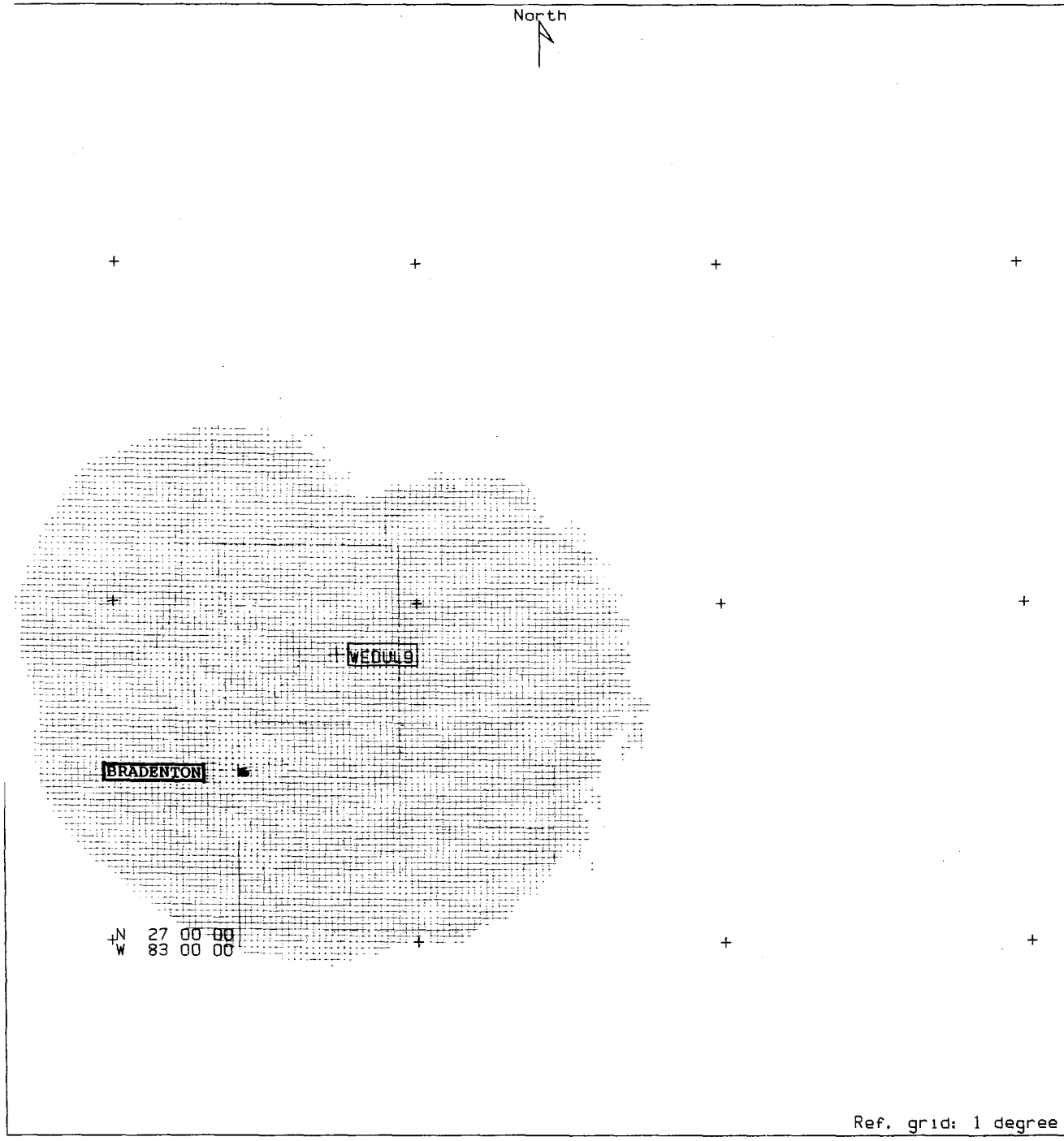
the 10 dB Max / Min ratio of 10 dB for VHF TV directional antennas since that particular antenna has a Max / Min ratio of 27.5 dB.

KESSLER AND GEHMAN ASSOCIATES, INC.

Keith D. Blanton

August 19, 1997

Keith G. Blanton, Consultant



MSITE(tm):\MSITE\WEDUDTV.

Propagation model: Longley-Rice v1.2.2
Time: 90.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\MSITE\PAT\NTSC
Height: 10.0 mtrs AGL Gain: .0 dBd

Field strength (at remote)

> 28.0 dBuV/m
< 28.0 dBuV/m

Minimum threshold level: -150.0 dBmW

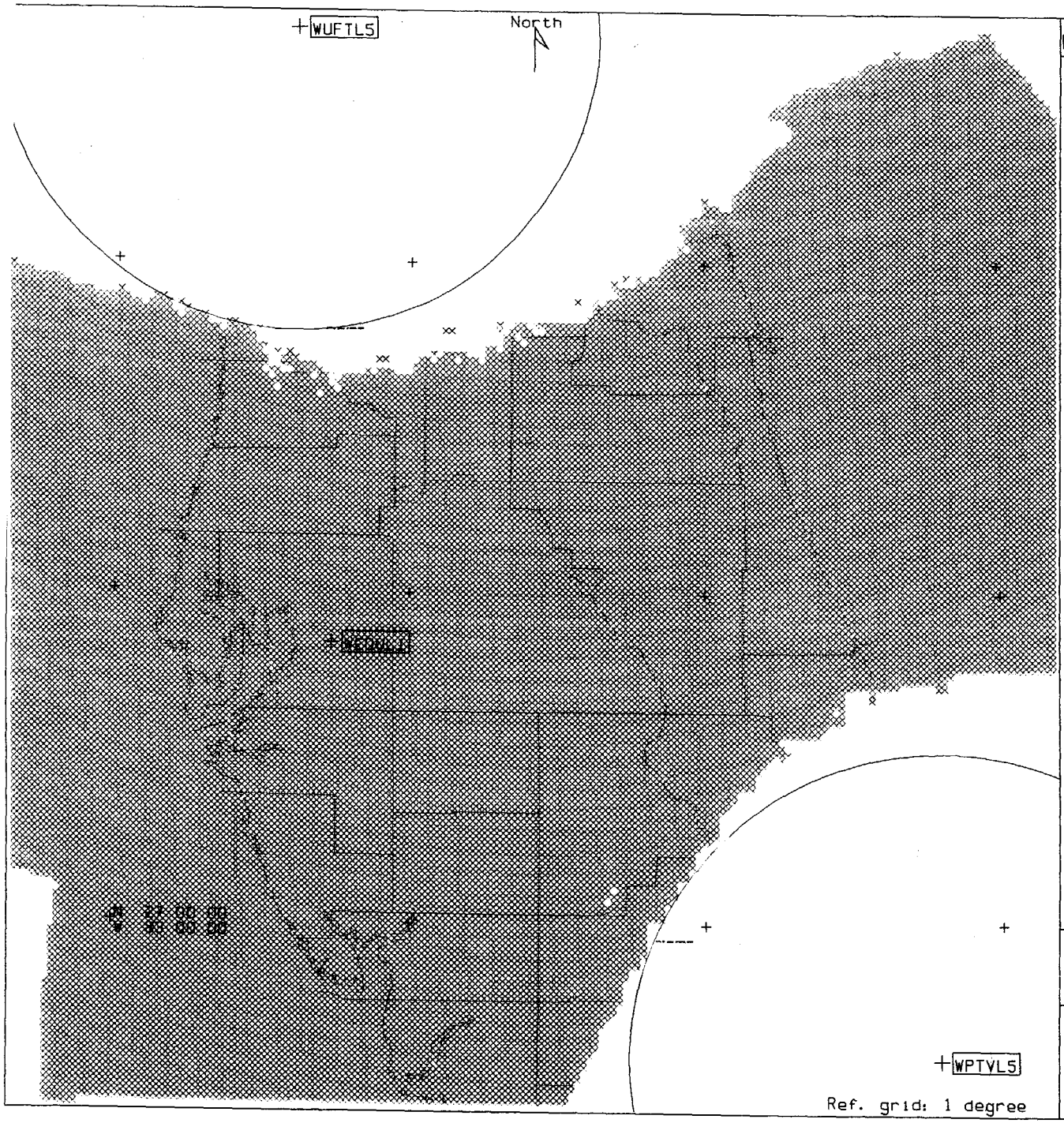
Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WEDUL9*	491.0	26.00	DA-H	N 27 50 52.00
grp: 1	79.0000 MHz		10.0	W 82 15 48.00

KILOMETERS
50 0 50

WEDU DTV STUDIES

Kessler and Gehman Associates

970819 FIG. 1



MSITE(tm):\MSITE\WEDUDTV.

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\MSITE\PAT\NTSC
Height: 10.0 mtrs AGL Gain: .0 dBd

C/I ratio - group 1 TXs to group 2 TXs

> 34.0
< 34.0

Minimum threshold level: -150.0 dBmW

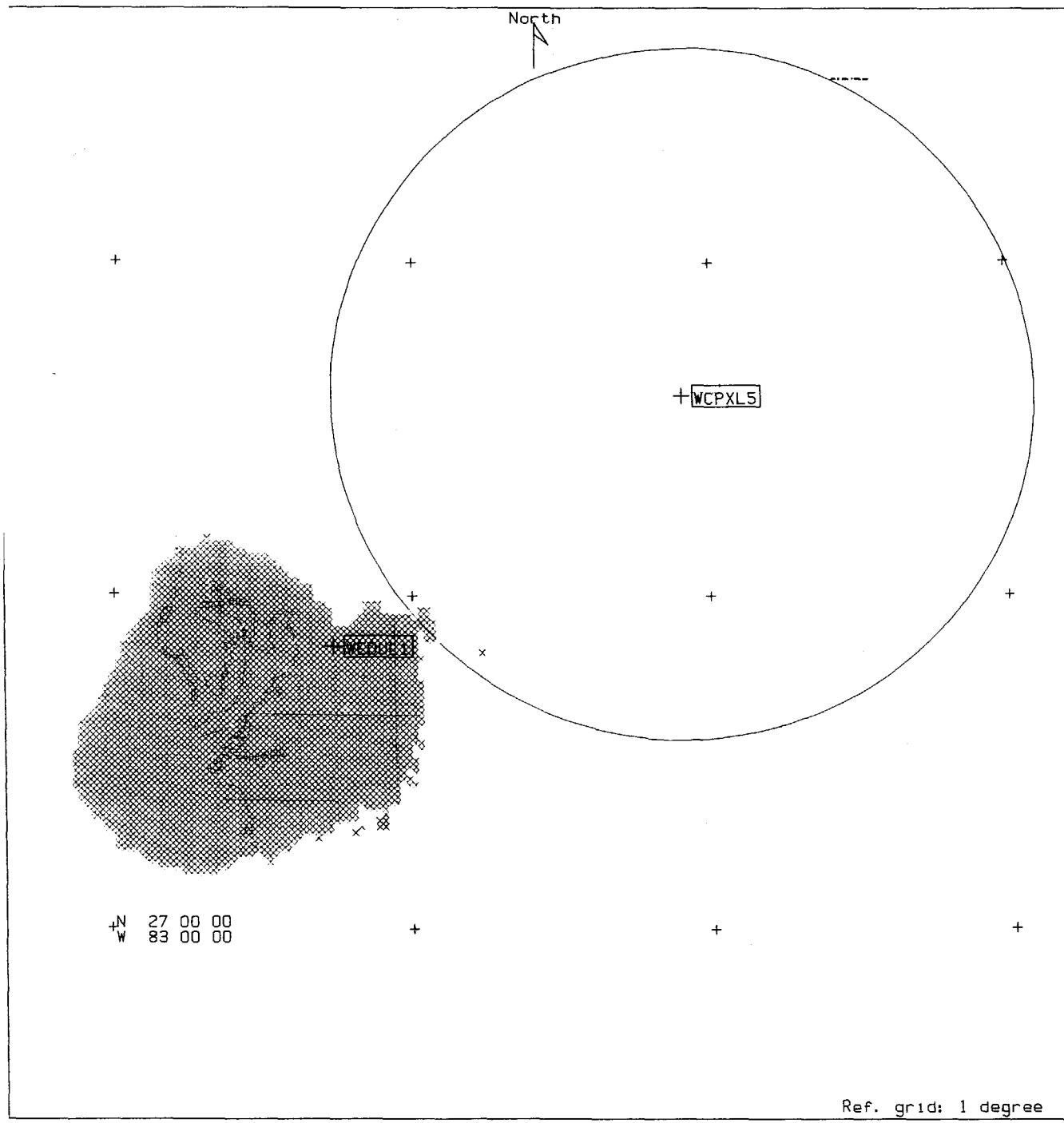
Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WEDUL1*	491.0	26.00	DA-H	N 27 50 52.00
grp: 2	79.0000 MHz		10.0	W 82 15 48.00
WUFTL5	306.0	50.00	OM-H	N 29 42 34.00
grp: 1	79.0000 MHz			W 82 23 40.00
WPTVL5	306.0	50.00	OM-H	N 26 35 20.00
grp: 1	79.0000 MHz			W 80 12 43.00

KILOMETERS
50 0 50

WEDU DTV STUDIES

Kessler and Gehman Associates

970819 FIG. 2



MSITE(tm):\MSITE\WEDUDTV.

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\MSITE\PAT\NTSC
Height: 10.0 mtrs AGL Gain: .0 dBd

C/I ratio - group 1 TXs to group 2 TXs

> -17.0
< -17.0

Minimum threshold level: -150.0 dBmW

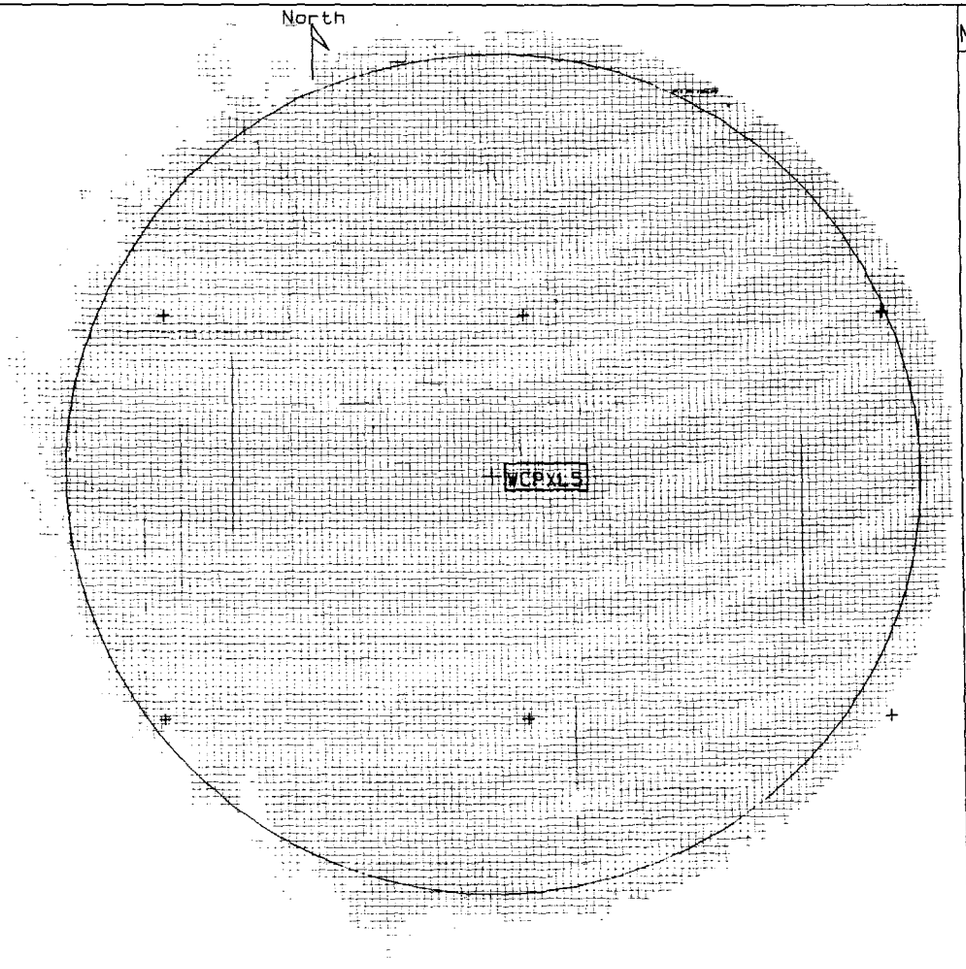
Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WEDUL1*	491.0	26.00	DA-H	N 27 50 52.00
grp: 2	79.0000 MHz		10.0	W 82 15 48.00
WCPXL5	458.0	50.00	OM-H	N 28 36 8.00
grp: 1	85.0000 MHz			W 81 5 37.00

KILOMETERS
50 0 50

WEDU DTV STUDIES

Kessler and Gehman Associates

970819 FIG. 3



N 27 00 00
W 83 00 00

Ref. grid: 1 degree

MSITE(tm):\MSITE\WEDUDTV.

Propagation model: Longley-Rice v1.2.2
Time: 50.00% Loc: 50.00% Margin: .0 dB
Climate: Continental Temperate
Gndcvr: None
Atm. factor: None
K Factor: 1.333
RX Antenna: DA-\MSITE\PAT\NTSC
Height: 10.0 mtrs AGL Gain: .0 dBd

Field strength (at remote)

> 47.0 dBuV/m
< 47.0 dBuV/m

Minimum threshold level: -150.0 dBmW

Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WCPXL5*	458.0	50.00	OM-H	N 28 36 8.00
grp: 1	85.0000 MHz			W 81 5 37.00

KILOMETERS
50 0 50

WEDU DTV STUDIES

Kessler and Gehman Associates

970819 FIG. 4